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STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

July 18, 1997

CERTIFIED MAIL # P 331 168 903
RETURN RECEIPT REQUESTED

Mr. Joseph Haake
McDonnell Douglas, St. Louis
Materials Services
P.O. Box 516, Department 64C
Mail Code 1003377
St. Louis, MO 63166-0516



R00062118
RCRA Records Center

RE: Interim Measures Work Plan Approval with Comments;
McDonnell Douglas Aerospace Tract I Facility; St. Louis,
Missouri; Permit Number: MOD 000 818 963

Dear Mr. Haake:

The Missouri Department of Natural Resources' (MDNR) Hazardous Waste Program, in coordination with the U.S. EPA Region VII (EPA), has completed review of the Interim Measures Work Plan (IMWP) received April 18, 1997, for the Tract I facility located in Hazelwood, Missouri. The IMWP was submitted pursuant to Corrective Action Condition IV. of the Missouri Hazardous Waste Management Facility Permit reissued to McDonnell Douglas (MCD) on March 5, 1997.

The IMWP is generally acceptable and is hereby approved in accordance with Corrective Action Condition XIII. of the Part I Permit with the following comments:

- Page 8, Section 2.3, Former SWMU #26 (Less-Than-90-Day Storage Area, Building 40):

The second complete paragraph of this section states that the reasoning for implementation of interim measures at this unit is not clearly set forth within the findings of the RFA. That is a correct statement, but further justification and explanation was provided to MCD in an MDNR response to



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the comments section which was attached to the final permit under a cover letter dated March 5, 1997. This unit was discussed under narrative listed as "response to comment #16" within the corrective action conditions response to comments. All text within the IMWP in the above-referenced paragraph shall be removed from the IMWP or be modified to reflect the MDNR's justification presented within the March 5, 1997, response to comments.

- Page 11, Section 2.4, SWMU #28 (Leaking Power Transformer, Building 6):

As previously discussed in telephone correspondence, MCD shall perform confirmatory sampling of the underlying soils or asphalt for polychlorinated biphenyls following removal of all visibly impacted soils and/or cleaning of any surface asphalt found at depth under the transformer. MCD shall compare and evaluate any contaminant levels detected to federal regulatory levels found within the Toxic Substance Control Act, Subpart G-PCB Spill Clean-Up Policy 761.125 and proposed Missouri Department of Health Any-Use Levels. Based upon these sampling results and evaluation, MCD shall also determine if additional interim measures are necessary at this unit.

MCD is required, as a function of this approval, to adequately address the foregoing comments via submittal of three copies of a revised IMWP within 30 days of receipt of this approval letter. MCD is strongly encouraged to contact MDNR/EPA if any questions should arise during revision of the IMWP to ensure that MCD's response to comments is satisfactory. MDNR/EPA will review the revised IMWP upon receipt and provide written acknowledgment of the findings of this review, however, this acknowledgment should not affect the IMWP implementation schedule.

MCD is hereby directed to begin IMWP implementation in accordance with the schedule contained therein. It is requested that MCD notify MDNR and EPA as to the projected starting date for IMWP implementation and provide notice to both agencies at least five working days in advance of any planned field activities associated with IMWP implementation to allow MDNR and EPA the opportunity to observe such activities.

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If you have any questions concerning this letter or other aspects of corrective action, please do not hesitate to contact Mr. Aaron Schmidt, of my staff, at (573) 751-3176.

Sincerely,

HAZARDOUS WASTE PROGRAM



Ed Sadler
Director

ES:asj

c: Robert L. Stewart, P.E., U.S. EPA Region VII ✓
MDNR, St. Louis Regional Office